

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division

CASE NO. 1:25-CV-23232-DPG

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

DOW JONES & COMPANY, INC. d/b/a THE WALL STREET JOURNAL, a Delaware corporation, NEWS CORPORATION, a Delaware corporation, KEITH RUPERT MURDOCH, an individual, ROBERT THOMSON, an individual, KHADEEJA SAFDAR, an individual, and JOSEPH PALAZZOLO, an individual,

Defendants.

/

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE A RESPONSE TO THE COMPLAINT AND TO SEAL
CERTAIN MATERIALS FROM THE COURT FILE**

Defendants, DOW JONES & COMPANY, INC., d/b/a THE WALL STREET JOURNAL, NEWS CORPORATION, KEITH RUPERT MURDOCH, ROBERT THOMSON, KHADEEJA SAFDAR, and JOSEPH PALAZZOLO (“Defendants”), by and through their undersigned counsel, and pursuant to *S.D. Fla. L.R. 5.4*, *Fed.R.Civ.P. 6(b)* and *S.D. Fla. L.R. 7.1(c)(1)A*, respectfully move without opposition for an extension of time in which to file a response to Plaintiff, PRESIDENT DONALD J. TRUMP’s (“Plaintiff”) Complaint [D.E. 1] and to redact and/or seal certain materials from the Court file and state as follows:

1. On July 18, 2025, Plaintiff filed its Complaint and Demand for Jury Trial [D.E. 1] alleging Defamation Per Se (Count I) and Defamation Per Quod (Count II). The undersigned counsel has agreed to accept service of process on behalf of all of the Defendants as of July 22,

2025, and pursuant to F.R.C.P. 12(a)(1)(A)(i), Defendants have until August 12, 2025 to file a response to such pleading.

2. Subsequently on July 21, 2025, Plaintiff filed its Notices of Proposed Summons for ROBERT THOMSON [D.E. 5], KEITH RUPERT MURDOCH [D.E. 7], and KHADEEJA SAFDAR [D.E. 8] (the “Summons”). The Summons contain the personal residential addresses of these Defendants. Due to the extraordinary sensitive nature of the allegations as well as the potential for injury to these parties if these matters remained in the public domain, the Parties have agreed to request that the Court seal these docket entries.

3. Mr. Thomson is the chief executive of Defendant, NEWS CORPORATION. Mr. Murdoch is an owner of Defendant, NEWS CORPORATION. Ms. Safdar is an enterprise reporter in the WALL STREET JOURNAL’s New York office. The parties to this action do not want to cause any potential harm to the privacy interests of these parties.

4. Notwithstanding, the public’s right of access to judicial records may be overcome, however, by a showing of good cause by the party seeking protection. *Chicago Tribune Co. v. Bridgestone/Firestone, Inc.*, 263 F. 3d 1304, 1313 (11th Cir. 2001). Good cause “generally signifies a sound basis or legitimate need to take judicial action. See *In re Alexander Grant & Co., Litig.*, 820 F. 2d 352, 355 (11th Cir. 1987), and if good cause is shown, the Court must then balance the interest in obtaining access to the information against the interest in keeping the information confidential. *Chicago Tribune Co.*, 263 F. 3d at 1313. In balancing these interests:

courts consider, among other factors, whether allowing access would impair court functions or harm legitimate privacy interests, the degree and likelihood of injury if made public, and reliability of the information, whether there will be an opportunity to respond to the information, whether the information concerns public officials or public concerns, and the availability of a less onerous alternative to sealing the documents.” *Id.* at 1246.

5. Good cause is established, as here, by the moving parties when disclosure may cause a clearly defined and serious injury. *NXP B.V. v. Research in Motion, Ltd.*, 2013 WL 4402833, *2 (M.D. Fla. August 15, 2013) (joint motion by the parties to seal documents granted because allowing public access could violate a party's and non-party's legitimate and private interests).

6. On July 22, 2025, the undersigned firm filed its Notice of Appearance on behalf of the Defendants. The undersigned counsel will need additional time to review the Complaint in order to become familiar with this matter and respond fully to same. As such, Defendants request an extension of time, through and including September 22, 2025 to file a response to such pleading¹.

7. This request for an extension of time is made timely, in good faith, for good cause and not for any improper purpose or undue delay. Plaintiff will not be prejudiced by the Court extending the deadline for Defendants to file a response to the Complaint.

8. In accordance with *S.D. Fla. L.R. 7.1.A.3*, the undersigned certifies that counsel for the Defendants has conferred with counsel for the Plaintiff, and there is no opposition to any of the relief requested herein.

9. Pursuant to *S.D. Fla. L.R. 7.A.2*, a proposed Order granting this Motion is enclosed.

WHEREFORE, Defendants, DOW JONES & COMPANY, INC., d/b/a THE WALL STREET JOURNAL, NEWS CORPORATION, KEITH RUPERT MURDOCH, ROBERT THOMSON, KHADEEJA SAFDAR, and JOSEPH PALAZZOLO respectfully request that the Court enter an Order granting the relief requested herein, including sealing docket entries 5,7, and

¹ F.R.C.P. 4(d)(3) provides that “a defendant who, before being served with process, timely returns a waiver need not serve an answer to the complaint until 60 days after the request was sent”).

8 in their entirety, *instanter*, and granting an extension through September 22, 2025 for Defendants to file a response to the Complaint, and grant any additional relief as is just, equitable and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed and served via the Court's CM/ECF portal on this 22nd day of July, 2025 to Alejandro Brito, Esq. (abrito@britopllc.com, apiroiu@britopllc.com) and Ian Michael Corp., Esq. (icorp@britopllc.com), BRITO, PLLC, 2121 Ponce de Leon Boulevard, Suite 650, Coral Gables, FL 33134 *Counsel for Plaintiff, President Donald J. Trump.*

GUNSTER, YOAKLEY & STEWART, P.A.
450 East Las Olas Boulevard, Suite 1400
Fort Lauderdale, Florida 33301
Telephone: (954) 462-2000

By: /s/ Eric C. Edison, Esq.
George S. LeMieux, Esq.
Florida Bar No. 16403
Email: glemieux@gunster.com
Eric C. Edison, Esq.
Florida Bar No. 010379
Email: eedison@gunster.com
Timothy J. McGinn, Esq.
Florida Bar No.: 347035
Email: tmcginn@gunster.com